

EXHIBIT B

PLAINTIFFS' OBJECTIONS TO DEFENDANT'S PROPOSED EXHIBITS

Plaintiffs hereby object to the following proposed Exhibits filed as part of Dorel's Pretrial

Disclosures:

Defendant's Exhibit 8

Plaintiffs object to the extent the proposed Geico Insurance exhibit will introduce insurance into the trial

Defendant's Exhibit 12

Plaintiffs object to the introduction of Mr. Boyd's Declaration at Trial. This witness has not been shown to be unavailable, and should appear and be subject to cross examination. Hearsay.

Defendant's Exhibit 13

Lack of Authentication, Hearsay, Relevance

Defendant's Exhibit 14

Plaintiffs object to the extent the proposed exhibit introduced insurance into the trial. Hearsay, lack of relevance and lack of authentication.

Defendant's Exhibit 15

Plaintiffs object to the extent the proposed exhibit introduced insurance into the trial. Hearsay, lack of relevance, and lack of authentication.

Defendant's Exhibit 34

Plaintiffs object to this cumulative exhibit referring generically to test videos, reports, and videos. The subject exhibit is cumulative, irrelevant, and would violate Fed. R. Evid. 403.

Defendant's Exhibit 35

Hearsay, lack of relevance, and violates Fed. R. Evid. 403

Defendant's Exhibit 36

It is impossible to identify this exhibit by the description provided. Plaintiff objects to the relevance of the proposed exhibit.

Defendant's Exhibit 39

Hearsay, relevance, and violates of Rule 403.

Defendant's Exhibit 40

Hearsay, relevance, and violates of Rule 403.

Defendant's Exhibit 41	Hearsay, relevance, and violates of Rule 403.
Defendant's Exhibit 42	Hearsay, relevance, and violates of Rule 403.
Defendant's Exhibit 43	Hearsay, relevance, and violates of Rule 403.
Defendant's Exhibits 45-49	Hearsay
Defendant's Exhibit 49	Hearsay, cumulative, relevance
Defendant's Exhibit 55	Hearsay, lack of authentication, relevance, lack of foundation
Defendant's Exhibit 60	Hearsay, relevance
Defendant's Exhibit 66	Relevance, hearsay, violates Rule 403
Defendant's Exhibit 67	Hearsay, relevance
Defendant's Exhibit 69	Hearsay, relevance
Defendant's Exhibit 70	Hearsay
Defendant's Exhibit 76	Hearsay, relevance
Defendant's Exhibit 78	Hearsay
Defendant's Exhibit 84	Hearsay, relevance, lack of foundation, lack of authentication, violates Rule 403
Defendant's Exhibit 85	Hearsay, relevance
Defendant's Exhibit 90	Hearsay, relevance, lack of authentication, lack of foundation, violates Rule 403
Defendant's Exhibit 92-94	Hearsay
Defendant's Exhibit 108 -109	Hearsay, relevance
Defendant's Exhibit 125	Hearsay, relevance, lack of foundation
Defendant's Exhibit 126	Hearsay, relevance
Defendant's Exhibit 128-138	Hearsay, relevance, lack of foundation, lack of authentication

Defendant's Exhibits 144-145	Hearsay, relevance
Defendant's Exhibit 152-162	Hearsay, relevance, lack of foundation, lack of authentication
Defendant's Exhibit 166	Hearsay
Defendant's Exhibit 169	Hearsay, relevance, lack of foundation
Defendant's Exhibit 170	Hearsay, cumulative, lack of foundation
Defendant's Exhibit 171	Lack of foundation, violates Rule 403, and never properly disclosed consistent with Rule 26
Defendant's Exhibit 172	Hearsay
Defendant's Exhibit 174	Hearsay, lack of foundation, cumulative, relevance
Defendant's Exhibit 175	Hearsay, lack of foundation, cumulative, relevance
Defendant's Exhibit 176	Lack of foundation, violates Rule 403, and never properly disclosed consistent with Rule 26
Defendant's Exhibit 177	Lack of foundation, violates Rule 403, and never properly disclosed consistent with Rule 26
Defendant's Exhibit 178	Hearsay
Defendant's Exhibit 179	Hearsay, lack of foundation, cumulative, relevance
Defendant's Exhibit 180	Hearsay, relevance, cumulative, lack of authentication
Defendant's Exhibit 181	Hearsay, lack of foundation, cumulative, relevance
Defendant's Exhibit 182	Hearsay
Defendant's Exhibit 183	Hearsay, relevance, cumulative, lack of authentication
Defendant's Exhibit 184	Hearsay, relevance, cumulative, lack of authentication
Defendant's Exhibit 185	Hearsay, relevance, cumulative, lack of authentication

Defendant's Exhibit 186	Hearsay
Defendant's Exhibit 187	Hearsay, relevance, cumulative, lack of authentication, violates Rule 403
Defendant's Exhibit 188	Hearsay, relevance, cumulative, lack of authentication, violates Rule 403
Defendant's Exhibit 189	Hearsay, relevance, cumulative, lack of authentication, violates Rule 403
Defendant's Exhibits 190-193	Lack of foundation, relevance, hearsay, lack of authentication, violates Rule 403
Defendant's Exhibit 197-203	Plaintiffs object to the extent Defendant seeks to introduce into evidence the demonstrative and tangible items mentioned because the items would not be relevant, contain hearsay in some instances, and would violate Rule 403
Defendant's Exhibit 204	Hearsay, relevance, lack of foundation, lack of authentication, violates Rule 403
Defendant's Exhibit 205	Hearsay, cumulative, relevance, lack of foundation, lack of authentication, violates Rule 403
Defendant's Exhibit 206	Hearsay, cumulative, relevance, lack of foundation, lack of authentication, violates Rule 403
Defendant's Exhibit 207	Lack of authentication, failure to disclose consistent with Rule 26 and this Court's orders
Defendant's Exhibit 208	Hearsay, lack of foundation, lack of authentication, violates Rule 403, cumulative, relevance